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March 31, 2020

VIA ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Fischler v. AGC, LLC*, Case 1:20-cv-01263-BMC

Dear Judge Cogan:

We are counsel for Defendant AGC, LLC in the above-captioned action.

We write to request: (1) a 45-day extension of time for AGC, LLC to move, answer or otherwise respond to the complaint, *i.e.* until May 18, 2020; and (2) a concomitant adjournment of approximately 45 days for the Initial Status Conference which is presently scheduled for April 22, 2020.

These extensions are requested to provide my client time to conduct a fact investigation, and due to exigencies resulting from the COVID-19 crisis.

There have been no prior requests for extensions of these deadlines. Plaintiff consents to this request. The Court has not scheduled any other deadlines for this case.

We greatly appreciate the Court's consideration of this request.

Respectfully,

/s/ Jeffrey M. Movit

Jeffrey M. Movit
A Professional Corporation for
MITCHELL SILBERBERG & KNUPP LLP